

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

KOHCHISE JACKSON,
Plaintiff,

v.

CORIZON HEALTH, Inc., et al,
Defendants.

Case No.: 2:19-cv-13382

Hon.: Terrence G. Berg

Mag.: Patricia T. Morris

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DECLARATION OF KOHCHISE JACKSON

I, Kohchise Jackson, declare under penalty of perjury pursuant to 28 U.S.C. 1746 that the following is true and correct to the best of my knowledge and recollection:

- 1) My name is Kohchise Jackson and I am over 18 years of age.
- 2) I was a pretrial detainee at the St. Clair County Correctional Facility from on or about May 16th, 2016 to March 23rd, 2017, and a prisoner in the custody of the Michigan Department of Corrections (MDOC) from on or about March 23rd, 2017 to May 16th, 2019.
- 3) In or around July of 2016, while I was a pretrial detainee at the St. Clair County Correctional Facility, I began to experience pain and feces and gas coming out of my penis.
- 4) I was seen by Dr. David A. Kraus at St. Clair County Correctional Facility at least four times between July and December of 2016.
- 5) At each examination Dr. Kraus prescribed me antibiotics. My condition did not change after taking antibiotics.
- 6) I was taken to a hospital on December 6th, 2016. The emergency room staff informed me that there was a hole between my large intestine and bladder.
- 7) I underwent surgery on December 10th, 2016. My large intestine was cut and rerouted to hole in my abdomen called a stoma. Following that procedure, I passed feces and gas through my stoma and into a colostomy bag.
- 8) My surgeon told me that I would need to be checked for leaks, and then I would undergo a second surgery to close my stoma.


- 9) Colleen Spencer is the head nurse at the St. Clair County Jail. She told me in late December 2016 or early January 2017 that I would get the reversal procedure, but then about a month later she told me my surgery had been "postponed."
- 10) Another nurse who worked at the jail told me that Ms. Spencer and my surgeon's office were going back and forth, arguing on the phone.
- 11) I did not receive the reversal surgery while I was in the St. Clair County Jail.
- 12) I was transferred to MDOC custody on or about March 23rd, 2017.
- 13) I did not receive the reversal surgery while I was in MDOC custody.
- 14) While I had a colostomy, I could not hold in my feces. There was no way for me to control when I defecated.
- 15) The bags and patches I was provided often did not fit my stoma or did not stay on very well. Sometimes the bag would come off when I was sleeping and I would wake up with feces all over my body and bed.
- 16) Sometimes my bag would fall off when I was in the yard, and I would get feces all over myself and my clothes, in front of everyone.
- 17) When the wafers were not the correct size for my stoma, feces would get packed around the edges and cause irritation.
- 18) There was also mucus that would drip out of my anus. My surgeon told me that the body makes this mucus to lubricate bowel movements. But since I was never having bowel movements through my rectum, the mucus would just keep building up in my rectum until it started to drip out.
- 19) While I had the colostomy, I smelled terrible and nobody wanted to live in a cell with me.

- 20) When I was in county jail, the jail staff would move me when another detainee complained about my smell. They kept transferring me all over the building because no one wanted to live with me, and at one point moved me to lockdown.
- 21) Lockdown is the same thing they do to punish detainees for disciplinary violations.
- 22) In the MDOC, custody staff keep track of whether a prisoner has "enemies," and if so, who they are. Housing assignments are made so that prisoners are not housed with their enemies in order to reduce the potential for violence.
- 23) Prisoners know that they can establish another prisoner as their enemy by assaulting that prisoner.
- 24) Prisoners that I was housed with assaulted me in order to cause the MDOC to move me somewhere else. From their perspective, the benefit of not having to live with me and my colostomy bag outweighed the punishment they would receive for fighting.
- 25) One time, I got punched in my stoma and blood and a yellow liquid were coming out into the bag, so they sent me to the hospital.
- 26) While I was incarcerated, I did everything I could think of to try to get a colostomy reversal. I asked the deputies at the jail for help, I begged the medical staff at the prison, I wrote grievances, I threatened to sue, and I wrote a letter to the Legislative Corrections Ombudsman.
- 27) When I was released from prison, I immediately signed up for Medicaid and got a colostomy reversal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9-14-21

Kochise Jackson



Kochise Jackson